

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Wisconsin & Milwaukee Hotel LLC,

Case No. 24-21743-gmh
Chapter 11

Debtor.

DEBTOR'S LIST OF WITNESSES

Wisconsin & Milwaukee Hotel LLC, the debtor herein (“**Debtor**” or “**WMH**”), by its attorneys Richman & Richman LLC, by Michael P. Richman and Claire Ann Richman, pursuant to the Order Modifying Schedule for Hearing on Confirmation of Chapter 11 Plan [Doc 562], submit the following List of Witnesses identifying individuals with knowledge of the issues to be tried in the confirmation hearings on the Debtor’s amended Chapter 11 plan, scheduled to be held from July 21, 2025 to July 25, 2025.

The Debtor may call the following witnesses who will testify as described below:

1. Mark Flaherty, an authorized representative of the Debtor. Mr. Flaherty is a managing member of Jackson Street Management LLC (“**Jackson Street Management**”), the manager of the Debtor. Mr. Flaherty may provide testimony in support of Plan confirmation, on the following subject matters:
 - i. the classification and treatment of claims under the Plan,
 - ii. the Debtor’s good faith in proposing its Plan,
 - iii. the infusion of new value by Debtor’s owner,

- iv. all other Plan provisions as to which the Debtor's business judgment was utilized.
- b. Any matters raised by other parties in pleadings or through testimony that relate to the foregoing, including the Debtor's business judgment.
- c. Debtor's opinions about Plan feasibility and the projections which underly it.
- d. Debtor's knowledge of relevant market conditions in Milwaukee that may affect the value of the Hotel.

2. Randall Erkert, an authorized representative of the Debtor. Mr. Erkert is a member of Jackson Street Management. Mr. Erkert may provide testimony in support of Plan confirmation, on the following subject matters:

- i. the classification and treatment of claims under the Plan,
- ii. the Debtor's good faith in proposing its Plan,
- iii. the infusion of new value by Debtor's owner,
- iv. all other Plan provisions as to which the Debtor's business judgment was utilized.

- b. Any matters raised by other parties in pleadings or through testimony that relate to the foregoing, including the Debtor's business judgment.
- c. Debtor's opinions about Plan feasibility and the projections which underly it.

d. Debtor's knowledge of relevant market conditions in Milwaukee that may affect the value of the Hotel.

3. Jennifer Cordova, an authorized representative of the Debtor. Ms. Cordova is the Controller for Jackson Street Management. Ms. Cordova may provide testimony in support of Plan confirmation, on the following subject matters:

- i. the classification and treatment of claims under the Plan,
- ii. interest rate underlying the prepetition loans and bonds, and rationale for applying that to Plan payments,
- iii. the Debtor's good faith in proposing its Plan,
- iv. the infusion of new value by Debtor's owner,
- v. all other Plan provisions as to which the Debtor's business judgment was utilized.

- b. Any matters raised by other parties in pleadings or through testimony that relate to the foregoing, including the Debtor's business judgment.
- c. Debtor's opinions about Plan feasibility and the projections which underly it.
- d. Debtor's knowledge of relevant market conditions in Milwaukee that may affect the value of the Hotel.

4. Jonathan Jaeger, a Senior Managing Director with LW Hospitality Advisors ("LWHA"). Mr. Jaeger will provide expert testimony of the valuation of the Debtor for purposes of the Plan's treatment of the Lenders' Claims, and for a

hypothetical liquidation under chapter 7 of the Bankruptcy Code. His valuation opinion is set forth in his appraisal, which is being served contemporaneously herewith as his expert report.

5. Deborah Friedland, a Managing Director with Eisner Advisory Group LLC (“EA Advisory Group”). Ms. Friedland will provide expert testimony on the following subject matters:

- a. the feasibility of the Debtor’s Plan, including but not limited to the Debtor’s projections, and
- b. relevant market conditions in Milwaukee that may affect the value of the Hotel.

Ms. Friedland’s opinion is set forth in her expert report, which is being served contemporaneously herewith.

6. William Pederson, a Director with EA Advisory Group. Mr. Pederson will provide expert testimony about the following subject matters:

- a. the value of a hypothetical liquidation under chapter 7 of the Bankruptcy Code, and
- b. the feasibility of the Debtor’s Plan, including but not limited to the Debtor’s projections.

Mr. Pederson’s opinion is set forth in his expert report, which is being served contemporaneously herewith.

7. All witnesses named by other parties to this action.
8. Any necessary impeachment or rebuttal witnesses.

9. The witnesses identified above may also testify in rebuttal to any other witnesses, including to any rebuttal reports to expert reports.

The Debtor also reserves the right to further amend and supplement this list of Witnesses and subjects as may be appropriate on the basis of the disclosures of other parties and subsequent developments.

Dated: June 6, 2025.

RICHMAN & RICHMAN LLC
Attorneys for Wisconsin &
Milwaukee Hotel LLC

By: */s/ Michael P. Richman*
Michael P. Richman
Claire Ann Richman
Eliza M. Reyes
122 West Washington Avenue,
Suite 850
Madison, WI 53703
Tel: (608) 630-8990
Fax: (608) 630-8991
MRichman@RandR.law
CRichman@RandR.law
EReyes@RandR.law